

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

CHRISTINE ABBOTT

*

Plaintiff,

*

CIVIL NO. 13-CV-3530

*

v.

*

OFFICER GRISHKOT, et al.

*

Defendants.

*

* * * * *

MOTION FOR CONTINUANCE

Defendants, Officers Lee Grishkot and Todd Edick, by their undersigned attorneys, Michael Marshall, Chaz Ball, and Schlachman, Belsky & Weiner, P.A., respectfully request that the June 8, 2015 trial be continued, pursuant to Fed. R. Civ. Proc. 6(b)(1)(A)(Lexis 2011) (“Rule 6”), and that the trial be reset for another date. In support of this Rule 6 Motion, Defendants state as follows:

1. The above captioned action is a civil rights case under 42 U.S.C. § 1983, involving the arrest and detention of Plaintiff, Christine Abbot, by law enforcement officers of the Baltimore Police Department (“BPD”).
2. On November 22, 2013, Plaintiff filed a Complaint against Defendants alleging she was wrongfully arrested and injured during the course of her arrest that occurred on or about June 2, 2012. That day, Plaintiff was transported to Baltimore City Central Booking and Intake Facility and charged with assault, resisting arrest, obstructing and hindering, and disorderly conduct. Plaintiff was released and the charges were subsequently dismissed.

3. On August 12, 2014, Plaintiff filed an Amended Complaint, dismissing Baltimore City as a defendant in this case.
4. Defendants filed their Answer to the Plaintiff Complaint on March 28, 2014 and an Answer to Plaintiff's Amended Complaint on August 12, 2014.
5. The undersigned recently learned that the date of his son's graduation from high school which includes events during the day, is on June 9, 2015, the second day of the scheduled trial. Both defense counsel intend to jointly try the case.
6. In addition, undersigned has another case scheduled to begin trial June 11, 2015, which overlaps with the trial scheduled for the above captioned case. On January 2, 2015, Plaintiff's counsel filed a Motion to Stay which was denied January 23, 2015.
7. Therefore, having shown "good cause" within the meaning of Rule 6(b)(1)(A), Defendants respectfully request that the Court issue an order granting them a continuance of the July 8, 2015 trial at a later date.

Respectfully submitted,

/s/ _____
Michael Marshall

/s/ _____
Chaz Ball
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Attorneys for Defendants Grishkot and Edick

CERTIFICATE OF SERVICE

I hereby certify that on this 27th day of January, 2015, a copy of the foregoing Motion was electronically filed with the United States District Court for the District of Maryland. All counsel of record are being served by the Court's electronic filing system or by first-class mail, properly addressed and postage prepaid.

/s/_____
Michael Marshall